

M 1 1 - 9 6 9

JAP:DAL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

ALEJANDRO JOSE RIVAS GONZALEZ,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

ILIANA PAGAN, being duly sworn, deposes and states that she is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about September 28, 2011, within the Eastern District of New York and elsewhere, defendant ALEJANDRO JOSE RIVAS GONZALEZ did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for her belief are as follows:¹

1. On or about September 28, 2011, the defendant ALEJANDRO JOSE RIVAS GONZALEZ arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, aboard Jet Blue Flight No. 834 from Santiago, Dominican Republic.

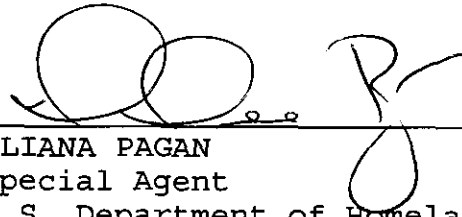
2. The defendant ALEJANDRO JOSE RIVAS GONZALEZ was selected for a Customs and Border Protection ("CBP") examination. The defendant presented for inspection a blue and black "California Pak" bag and red and black "Ogio" bag. The defendant claimed ownership of the bags and their contents.

3. During an inspection of the defendant's bags, a CBP officer observed that the "California Pak" bag had unusually thick sides. Further examination revealed that the sides of the bag contained a white powdery substance, which field-tested positive for the presence of cocaine.

4. The total approximate gross weight of the cocaine found in the defendant ALEJANDRO JOSE RIVAS GONZALEZ's bag is 1,154.3 grams.

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that defendant ALEJANDRO JOSE RIVAS GONZALEZ be dealt with according to law.

A handwritten signature in black ink, consisting of a large, stylized 'P' followed by a horizontal line and a small 'R'.

ILIANA PAGAN
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
29th day of September, 2011

GE